

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

DEUTSCHE BANK TRUST COMPANY	)	Civil Action No. 11-CV-00358
AMERICAS, in its capacity as successor	)	
indenture trustee for certain series of	)	JUDGE BECKWITH
Senior Notes, <i>et al.</i> ,	)	MAGISTRATE JUDGE BOWMAN
	)	
Plaintiffs,	)	
v.	)	
	)	
AMERICAN ELECTRIC POWER, <i>et al.</i> ,	)	
	)	
Defendants.	)	

**UNOPPOSED MOTION OF PROGRESSIVE CASUALTY INSURANCE  
COMPANY FOR ENTRY OF AGREED ORDER EXTENDING  
TIME TO ANSWER OR OTHERWISE RESPOND TO  
PLAINTIFFS' SECOND AMENDED COMPLAINT**

Plaintiffs Deutsche Bank Trust Company Americas, in its capacity as successor indenture trustee for certain series of Senior Notes, Law Debenture Trust Company of New York, in its capacity as successor indenture trustee for certain series of Senior Notes, and Wilmington Trust Company, in its capacity as successor indenture trustee for the PHONES Notes ("Plaintiffs"), and Defendant Progressive Casualty Insurance Company ("Progressive"), have agreed to extend the time within which Defendant Progressive may answer or otherwise respond to Plaintiffs' Second Amended Complaint until the later of January 30, 2012, or 30 days after the record in this case is docketed in a Multidistrict Litigation case, subject to any stay of proceedings that may otherwise be ordered by the Court. Accordingly, pursuant to Local Rule 7.3(a) and 7.4, Defendant Progressive hereby moves the Court to grant the requested extension per the parties' agreement.

Respectfully submitted,

/s/ Todd A. Atkinson

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**CERTIFICATE OF SERVICE**

I hereby certify that on November 21, 2011, a copy of the foregoing  
*Motion of Progressive Casualty Insurance Company for Entry of Agreed Order  
Extending Time to Answer or Otherwise Respond to Plaintiffs' Second Amended  
Complaint* was filed electronically. Notice of this filing will be sent to all parties by  
operation of the Court's Electronic Case Filing System. Parties may access this filing  
through the Court's Electronic Case Filing System.

/s/ Todd A. Atkinson  
*One of the Attorneys for Defendant  
Progressive Casualty Insurance  
Company*